

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

Case No.: 3:22-cv-01475

DAVID BEHRENS,

Plaintiff,

v.

KIMBERLY CLARK CORPORATION,  
COTTONELLE, AMAZON.COM INC., STOP  
& SHOP KEYPORT, JOHN DOES 1-30 (said  
names fictitious, real names unknown) and ABC  
CORPS. 1-30 (said names fictitious, real names  
unknown),

Defendants.


**AFFIDAVIT OF LISA KIM PURSUANT TO N.J.S. 2A:58C-8**

I, Lisa Kim, affirm under penalty of perjury and pursuant to 28 U.S.C. 1746 as follows:


1. I am employed by Defendant Amazon.com, Inc. (“Amazon”) as Senior Manager, Vendor Management.
2. I make this Affidavit in support of Amazon’s motion to dismiss Plaintiff’s Complaint and pursuant to N.J.S. 2A:58C-8. The statements contained in this affidavit are based on my review of corporate records maintained by Amazon in the regular course of business.
3. Amazon does not design, manufacture, package, or label the Cottonelle brand Fresh Feel Flushable Wet Wipes for Adults (“Product”).
4. Plaintiff has identified Kimberly-Clark Corporation (“Kimberly-Clark”) as the manufacturer of the Product and named Kimberly-Clark as a defendant in the above captioned litigation. Kimberly-Clark manufactures the Product.
5. Amazon does not exercise any control of the design, manufacture, packaging, or labeling of the Product. Amazon is not the manufacturer of the Product.

6. I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

April 29, 2022

  
Lisa Kim

Subscribed and sworn before me this  
29<sup>th</sup> day of April, 2022

  
Notary Public  
Alan D. Clark  
My Commission Expires  
3/9/2024

